

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LAURA MCKNIGHT, TRISHA §
TURNER, ANDREW BAKER, RACHAEL §
FREEDMAN, KIMBERLY MCCRAY, §
and MARGO MORENO, §

Plaintiffs,

V.

Civil Action No. H-09-3345

D. HOUSTON, INC. D/B/A	\$
TREASURES, A.H.D. HOUSTON, INC.	\$
D/B/A CENTERFOLDS,	\$
D N.W. HOUSTON, INC. D/B/A GOLD	\$
CUP, D. RANKIN, INC. D/B/A TROPHY	\$
CLUB, D WG FM, INC. D/B/A	\$
SPLENDOR, W.L. YORK, INC. D/B/A	\$
COVER GIRLS, AND, IN THEIR	\$
INDIVIDUAL CAPACITIES,	\$
ALI DAVARI and HASSAN DAVARI,	\$

Jury Trial Demanded

Defendants.

DEFENDANTS' RULE 26 INITIAL DISCLOSURES

To: Plaintiffs, Laura McKnight, Trisha Turner, Andrew Baker, Rachael Freedman, Kimberly McCray, and Margo Moreno, by and through their attorney of record, Martin A. Shellist, SHELLIST LAZARZ, LLC, 1900 West Loop South, Suite 1910, Houston, Texas 77027

Defendants D. Houston, Inc. d/b/a Treasures, A.H.D. Houston, Inc. d/b/a Centerfolds, D N.W. Houston, Inc. d/b/a Gold Cup, D. Rankin, Inc. d/b/a Trophy Club, D WG FM, Inc. d/b/a Splendor, W.L. York, Inc. d/b/a Cover Girls, and, in their individual capacities, Ali Davari and Hassan Davari, make these initial disclosures as required by Federal Rule of Civil Procedure 26(a)(1).

A. Individuals with Discoverable Information

D. Houston, Inc. d/b/a Treasures
Ali Davari
Hassan Davari
c/o Albert T. Van Huff
Monshaugen & Van Huff, P.C.
1225 North Loop West, Suite 640
Houston, Texas 77008
(713) 880-2992

Plaintiffs and certain agents of plaintiffs.

B. Relevant Documents & Tangible Things

Any and all relevant documents and tangible things that are in Treasures' possession were produced to plaintiffs in response to their request for production.

C. Information Related to Calculation of Damages

Not applicable. Defendants are not claiming any damages at this time; however, defendants assert that plaintiffs are not entitled to any damages.

D. Insurance

Defendants do not have insurance agreements covering this dispute.

Respectfully submitted,

By: /s/ Albert T. Van Huff
ALBERT T. VAN HUFF
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Southern District No. 26968
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Houston, Texas 77008
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ATTORNEY FOR DEFENDANTS

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing document was forwarded to counsel for plaintiffs via electronic filing on the 1st day of March, 2010.

/s/ Albert T. Van Huff
ALBERT T. VAN HUFF